



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

MAR 31 2015

Mr. Rudolf S. Chow, P.E., Director
Baltimore Department of Public Works
200 N. Holiday Street, 6th Floor
Baltimore, Maryland 21202

Re: Administrative Order for Compliance on Consent Docket No. SDWA-03-2010-123-DS

Dear *Rudy* Mr. Chow:

Pursuant to paragraph 31 of the Administrative Order for Compliance on Consent ("Order"), in a letter dated August 29, 2014, Baltimore petitioned EPA for additional time to meet deadlines in the Schedule (appendix A) for three reservoirs. Construction on two reservoirs has been completed (see Table 1).

Table 1: Completed Projects

Project Name	Task	Original Finish Date	Reported Finish Date
Montebello Reservoir	Construction	June 30, 2014	May 27, 2014
Towson Reservoir	Construction	May 31, 2013	December 22, 2013

For the remaining three reservoirs, EPA is hereby approving a modification to the City of Baltimore Open Reservoir Replacement Compliance Schedule. The City provided an explanation of delay and new dates for which tasks will be finished:

- In June, 2012, Baltimore indicated that it was changing how it intended to comply with the regulatory requirements to protect finished water. For the Druid Lake and Ashburton Reservoirs, Baltimore originally planned to install additional treatment for microbial contamination. In a phone call of June 15, 2012, and a letter of June 22, 2012, Baltimore explained that it had decided to instead install covered tanks because "covered tanks will provide more comprehensive long-term protection for the City's water supply." Subsequently, the City provided reports that documented its interim steps and the delays associated with those steps, such as selecting sites for the covered tanks, and addressing citizen concerns with the plans and disposition of the reservoirs.

- For Guilford Reservoir, Baltimore encountered a delay in meeting the milestone for Construction Notice to Proceed. Initial bids received in September, 2014, were substantially over budget due to the bidders' interpretation of some contract provisions. Baltimore reported in its November 26, 2014 quarterly progress report that the City rejected the bids and required a re-bidding process after clarifying some conditions.

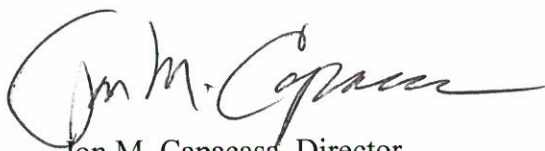
In accordance with paragraph 26 of the Order, Baltimore shall continue to submit quarterly reports to describe the progress on the installation of treatment, replacement or coverage of its three remaining reservoirs. The City shall meet all start and finish dates in the Revised Schedule for Open Reservoir Replacement as listed in Table 2.

Table 2: Revised Schedule for Open Reservoir Replacement

Project Name	Task	Original Finish Date	Revised Start Date	Revised Finish Date
Guilford Reservoir	Study & Design	September 3, 2013		January 10, 2014
	Construction	February 16, 2016	February 1, 2016	July 1, 2019
Druid Lake Reservoir	Study & Design	February 28, 2012		December 31, 2015
	Construction	February 28, 2014	August 31, 2016	August 31, 2021
Ashburton Reservoir	Study & Design	May 29, 2014		April 1, 2016
	Construction	December 31, 2018	January 1, 2017	December 31, 2021

If you have any questions, please contact Lisa Donahue of the Ground Water and Enforcement Branch at 215-814-2062 or donahue.lisa@epa.gov or Philip Yeany of the Office of Regional Council at 215-814-2495 of yeany.philip@epa.gov.

Sincerely,



Jon M. Capacasa, Director
Water Protection Division

cc: Saeid Kasraei, MDE